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July 9, 2021

Via ECF

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 12B
New York, NY 10007

Re: Mirror Worlds Techs., LLC v. Facebook, Inc.,
Civil Action No. 1:17-cv-03473 (JGK)

Dear Judge Koeltl:

We write on behalf of Mirror Worlds Technologies, LLC (“MWT”) in the above identified civil case. We respectfully request permission to file under seal Exhibit 54 to the Declaration of James Tsuei in Support of MWT’s Opposition to Facebook’s Motion for Summary Judgment and MWT’s Response to Facebook’s Daubert Motion to Exclude Certain Opinions of Eric Koskinen, Ph.D.

This document contains information that Facebook has designated as “CONFIDENTIAL,” “HIGHLY CONFIDENTIAL - ATTORNEYS’ EYES ONLY,” “HIGHLY CONFIDENTIAL – PATENT PROSECUTION BAR,” or “HIGHLY CONFIDENTIAL – SOURCE CODE” pursuant to the protective order (Dkt. 98). The Declaration of James Tsuei and exhibits thereto were previously filed on July 1, 2021. Exhibit 54 was inadvertently not included in that filing, but has been included in the corrected filing today. The parties met and conferred on June 30, 2021 to discuss the sealing and redactions of the motions and supporting materials, and have endeavored to narrow their requests.

MWT understands from Facebook that Exhibit 54 contains and reflects highly confidential and proprietary information related to the design and structure of Facebook’s products, including citation to confidential internal Facebook documents and deposition testimony which have been designated “Highly Confidential – Attorneys’ Eyes Only – Patent Prosecution Bar.” MWT understands from Facebook that such information, if made public, would cause Facebook commercial and competitive harm by revealing to Facebook’s competitors sensitive and proprietary information about the design and structure of Facebook’s systems. MWT understands that Facebook, therefore, respectfully requests that the undredacted versions of these materials remain under seal. *See* Dkt. 284-285.

APPLICATION GRANTED
SO ORDERED

John G. Koeltl
John G. Koeltl, U.S.D.J.

7/12/21

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DOC #: _____
DATE FILED: 7/12/2021



MWT therefore respectfully requests permission to file these materials under seal. We appreciate your time and consideration on this matter.

Respectfully submitted,

/s/ Benjamin T. Wang

Benjamin T. Wang